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*Counsel for Defendant
Fortnoff Financial, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, as assignee of
individuals who are Covered Persons,
JANE DOE-1, a law enforcement office,
JANE DOE-2, a law enforcement
officer, EDWIN MALDONADO,
SCOTT MALONEY, JUSTYNNA
MALONEY, PATRICK COLLIGAN,
and WILLIAM SULLIVAN,

Plaintiffs,

vs.

FORTNOFF FINANCIAL, LLC,
RICHARD ROES 1-10, fictitious names
of unknown individuals and ABC
COMPANIES 1-10, fictitious names of
unknown entities,

Defendants.

Civil Action No. 1:24-cv-04390-HB

**JOINT MOTION TO STAY ALL
DEADLINES**

Plaintiffs Atlas Data Privacy Corporation, Jane Doe-1, Jane Doe-2, Edwin Maldonado, Scott Maloney, Justyna Maloney, Patrick Colligan, and William Sullivan (“Plaintiffs”) and Defendant Fortnoff Financial, LLC (“Defendant”) by and through their undersigned counsel and subject to the approval of this Court, hereby files this Unopposed Motion to Stay all Deadlines, and in support thereof, respectfully shows the Court as follows:

All matters in controversy between Plaintiffs and Defendant (jointly, the “Parties”) have been settled in principle. The Parties are in the process of memorializing the terms of a written settlement agreement. The Parties anticipate that they will be able to perform such terms within sixty (60) days. Accordingly, the Parties respectfully request that the Court grant a stay of the proceedings between the parties, including all deadlines, until July 8, 2025.

The Parties agree that should settlement not be achieved by July 8, 2025, nothing shall bar Defendant from filing a responsive pleading in this matter.

Good cause exists for granting this Joint Motion, as set forth above. The Motion is not filed for purposes of delay, but so that justice may be served.

WHEREFORE, Plaintiff and Defendant pray that this Honorable Court will grant their Joint Motion to Stay All Deadlines and stay proceedings in this matter until July 8, 2025.

Respectfully submitted this 14th day of May, 2025.

PEM LAW LLP
(signed with express permission)
/s/ Rajiv D. Parikh

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on May 14, 2025 to all counsel of record who is deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ J. Timothy McDonald
J. Timothy McDonald (ID No. 027201990)